

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Gary T. Holtzer
Jacqueline Marcus
Matthew P. Goren

Attorneys for the Parent Debtor

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

	X
	:
In re	Chapter 11
	:
ALL YEAR HOLDINGS LIMITED,	Case No. 21-12051 (MG)
	:
Debtor.¹	:
	:
Fed. Tax Id. No. 98-1220822	:
	X

**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746 REGARDING
MOTION OF PARENT DEBTOR FOR ENTRY OF ORDER PURSUANT TO
FED. R. BANKR. P. 9006(b) AND 9027 ENLARGING TIME WITHIN
WHICH TO FILE NOTICES OF REMOVAL OF RELATED PROCEEDINGS**

TO THE HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746 and Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Bankruptcy Rules**”), the undersigned hereby certifies as follows:

1. On December 14, 2021 the Parent Debtor commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code. On March 14, 2022, the

¹ The Parent Debtor’s principal offices are located at 199 Lee Avenue, Suite 693, Brooklyn, New York 11211.

Parent Debtor filed the *Motion of Parent Debtor for Entry of Order Pursuant to Fed. R. Bankr. P. 9006(b) and 9027 Enlarging Time Within Which to File Notices of Removal of Related Proceedings* [Docket No. 57] (the “**Motion**”)². The Parent Debtor served the Motion and the Proposed Order on the Notice Parties.

2. The deadline for parties to object or file responses to the Motion was March 22, 2022 at 4:00 p.m. (Prevailing Eastern Time) (the “**Objection Deadline**”). Local Bankruptcy Rule 9075-2 provides that a motion or application may be granted without a hearing, provided that no objections or other responsive pleadings have been filed or served before 48 hours after the relevant objection deadline and the attorney for the entity who filed the pleadings complies with certain procedural and notice requirements.

3. The Objection Deadline has passed and, to the best of my knowledge, no objection, responsive pleading, or request for a hearing with respect to the Motion has been (a) filed with the Court on the docket of the above captioned chapter 11 case or (b) served on counsel to the Parent Debtor.

4. Accordingly, the Parent Debtor respectfully requests that the Proposed Order granting the relief requested in the Motion, annexed hereto as Exhibit A, be entered in accordance with Local Bankruptcy Rule 9075-2.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

I declare the foregoing is true and correct.

Dated: March 24, 2022
New York, New York

/s/ Jacqueline Marcus
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Gary T. Holtzer
Jacqueline Marcus
Matthew P. Goren

Attorneys for the Parent Debtor

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X-----
In re : **Chapter 11**
ALL YEAR HOLDINGS LIMITED, : **Case No. 21-12051 (MG)**
Debtor.¹ :
Fed. Tax Id. No. 98-1220822 :
-----X-----

**ORDER PURSUANT TO FED. R. BANKR. P. 9006(b) AND 9027 ENLARGING TIME
TO FILE NOTICES OF REMOVAL OF RELATED PROCEEDINGS**

Upon the motion, dated March 14, 2022 [ECF No. 57] (the “**Motion**”)², of All Year Holdings Limited, as debtor and debtor in possession (the “**Parent Debtor**”) in the above-captioned chapter 11 case (the “**Chapter 11 Case**”), pursuant to Rules 9006(b) and 9027 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Rule 9006-2 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Bankruptcy Rules**”), for entry of an order enlarging the time within which to file notices of removal of civil actions and of related proceedings to which the Parent Debtor is a party (the “**Civil Actions**”), all as more fully set forth in the Motion; and the Court having jurisdiction to decide the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the

¹ The Parent Debtor’s principal offices are located at 199 Lee Avenue, Suite 693, Brooklyn, New York 11211.

² Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

relief requested in the Motion having been provided to the Notice Parties, and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Parent Debtor, its estate, its creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.
2. The time period provided by Bankruptcy Rule 9027 within which the Parent Debtor may file notices of removal of the Civil Actions is extended until the date an order is entered confirming a chapter 11 plan in the Chapter 11 Case.
3. The Parent Debtor is authorized to take all action necessary to effectuate the relief granted in this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2022
New York, New York

HONORABLE MARTIN GLENN
CHIEF UNITED STATES BANKRUPTCY JUDGE